

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

GERALD GORDON, ESQUIRE AS ATTORNEY FOR
PLAINTIFF
83 PATERSON STREET
PO BOX 800
NEW BRUNSWICK NJ 08903-0800
tel 732 991 5720
fax 732 247 3837
geraldgordonlaw@aol.com
ATTORNEY FOR PLAINTIFF(S)

CIVIL ACTION NO.

JARED ROSENBLATT

:

PLAINTIFF

:

COMPLAINT

DEMAND FOR TRIAL BY JURY

V

COUNTY OF MIDDLESEX NEW JERSEY

COUNTY OF MIDDLESEX BOARD OF FREEHOLDERS,

MIDDLESEX COUNTY ADULT CORRECTION CENTER ("MCACC")

EDWARD CHICCHI,

CHRISTOPHER RAFANO, FREEHOLDER

FREEHOLDER(S) PRESENT AND PAST ASSIGNED TO AND/OR IN CHARGE
OF THE MIDDLESEX COUNTY ADULT CORRECTION CENTER

DEPUTY WARDEN, MIDDLESEX COUNTY ADULT CORRECTION CENTER.

STEVEN DALINA, FREEHOLDER

MILDRED S SCOTT, FREEHOLDER

BLANQUITA VALENTI, FREEHOLDER

CAROL BARRET, FREEHOLDER

RONALD G RIOS, FREEHOLDER

H JAMES POLOS, FREEDHOLDER

DAVID CRABIEL, DECEASED FORMER FREEHOLDER

JOHN POLUMENA, BUSINEDSDSD ADMINISTRATOR & FORMER FREEHOLDER

WALTER DEANGLIS, FORMER BUSINESS ADMINISTRATOR

MARY DOE" 1- 100,

JOHN DOE 1 - 100 AND

MARY SMITH 1 – 100

JOHN SMITH 1 – 100

MARY JONES 1 – 100

JOHN JONES 1 - 100

DEFENDANTS

BY WAY OF COMPLAINT AGAINST THE DEFENDANTS PLAINTIFF LAST RESIDING IN ESSEX COUNTY, NEW JERSEY SAYS:

OMNIBUS

1. TO THE EXTENT THERE ARE ANY INCONSISTENCIES OR CONTRADICTIONS IN EACH OR ANY OF THE COUNTS OR ALLEGATIONS IN OR OF THIS COMPLAINT OR ANY OTHER MATTERS IN THIS PLEADING THEN THEY ARE TO BE INTERPRETED, CONSTRUED, AND APPLIED IN A MANNER ONLY TO THE BENEFIT AND ONLY TO THE BEST INTERESTS OF PLAINTIFF. THIS INCLUDES, WITHOUT LIMITATION, ALTERNATIVE, INCONSISTENT AND/OR CONTRADICTORY PLEADINGS OR ALLEGATIONS AND/OR MISTATEMENTS OF LAW/AND/OR MISTATEMENTS OF FACTS AND/OR OMISSIONS AND/OR ANYTH

CLASS ACTION.

PLAINTIFF IS A MEMBER OF A CLASS CONSISTING OF THOUSANDS THAT HAVE BEEN SUBJECTED TO THE SAME OR SIMILAR ILLEGAL CONDUCT AS ALLEGED BY PLAINTIFF AND AS SUCH PLAINTIFF INTENDS TO SEEK CERTIFICATION AS A CLASS ACTION.**PARTIES.**

2. PLAINTIFFS RESIDENCE IS IN SOUTH RIVER NEW JERSEY.

3. THE NAMED DEFENDANTS AS SET FOR IN THE CAPTION ARE INCORPORATED HEREIN
4. THE NAMES OF THE DEFENDANTS DOE, SMITH, AND JONES ARE FICTITIOUS BECAUSE THE TRUE NAMES OF THESE DEFENDANTS ARE UNKNOWN AND INCLUDE, BUT ARE NOT LIMITED TO, CHIEF(S) OF CORRECTIONS OFFICERS, SUPERVISORY CORRECTIONS OFFICERS, ADMINISTRATIVE CORRECTIONS OFFICERS, SUPERIOR CORRECTIONS OFFICERS, NON SUPERIOR CORRECTIONS OFFICERS, CORRECTIONS OFFICERS, ADMINISTRATIVE PERSONNEL, DEPUTY WARDEN(S) INTERNAL INVESTIGATIONS OFFICERS, COUNTY FREEHOLDERS AND ALL OTHER EMPLOYEES, AGENTS, SERVANTS AND ANY AND ALL OTHERS ACTING IN ANY CAPACITY FOR AND/OR ON BEHALF OF ONE OR MORE OF THE DEFENDANT GOVERNMENTAL ENTITIES.
5. ANY DEFENDANT, WHO IS A PERSON, WHETHER IDENTIFIED BY ACTUAL NAME, FICTITIOUS NAME, POSITION, OFFICE, OR OTHERWISE, WAS ACTING ON BEHALF OF ONE OR MORE OF THE DEFENDANT GOVERNMENT ENTITIES AS AN EMPLOYEE, AGENT, SERVANT, REPRESENTATIVE, OR ACTING IN ANY CAPACITY FOR AND/OR ON BEHALF OF ONE OR MORE OF THE DEFENDANT GOVERNMENTAL ENTITIES.
6. THE TRUE FULL NAME OF THE DEFENDANT MAIMONE IS NOT KNOWN AND AS SUCH SHE/HE IS IDENTIFIED AS IN THE SAME MANNER AS IDENTIFIED IN A POLICE REPORT.
7. THE TRUE FULL NAME OF THE DEFENDANT POWERS IS NOT KNOWN AND AS SUCH SHE/HE IS IDENTIFIED HEREIN IN THE SAME MANNER AS IDENTIFIED IN A POLICE REPORT.

8. DEFENDANTS MEANS ONE OR MORE OF THE DEFENDANTS.

JURISDICTION.

9. JURISDICTION IS FOUNDED UNDER 42 U.S.C. Section 1983 & 1988 AND/OR 28 U.S.C. SECTION 1331; SECTION 1343(3); THE FIRST, FOURTH, FIFTH, SIXTH, EIGHTH AMENDMENTS, AND FOURTEENTH AMENDMENTS OF AND TO THE CONSTITUTION OF THE UNITED STATES OF AMERICA, AND/OR THE EQUAL PROTECTION AND/OR THE DUE PROCESS CLAUSES OF THE UNITED STATES OF AMERICA AND THE NEW JERSEY CONSTITUTION.

10. THE COURT HAS SUPPLEMENTAL JURISDICTION OVER THE STATE LAW CLAIMS PURSUANT TO 28 U.S.C. 1367. VENUE IS PROPER IN THIS DISTRICT UNDER 28 U.S.C. SECTION 1391(b) IN THAT ALL CLAIMS AROSE IN THIS DISTRICT.

STATEMENT OF FACTS.

11. THE DEFENDANTS, ONE OR MORE OF HAVE AND CONTINUE TO ENGAGE IN A PATTERN OF PRACTICE WHEREIN INMATES AT THE MIDDLESEX COUNTY ARE MISTREATED, ABUSED, AND OTHERWISE HAVE HAD THEIR RIGHTS AND PROTECTION PROVIDED BY AND UNDER THE LAWS OF THE UNITED STATES OF AMERICA AND THE STATE OF NEW JERSEY VIOLATED AND DISREGARDED

12. THE DEFENDANTS, ONE OR MORE OF HAVE AND CONTINUE TO ENGAGE IN A PATTERN OF PRACTICE WHEREIN THEY COVERUP INCIDENTS WHERE INMATES AT

THE MIDDLESEX COUNTY ARE MISTREATED, ABUSED, AND OTHERWISE HAVE HAD THEIR RIGHTS AND PROTECTION PROVIDED BY AND UNDER THAT LAWS OF THE UNITED STATES OF AMERICA AND THE STATE OF NEW JERSEY VIOLATED AND DISREGARDED.

13. THE PLAINTIFF AS BEEN SUBJECTED TO SUCH ILLEGAL CONDUCT DURING THE COURSE OF HIS IMPRISONMENT AT THE MIDDLESEX COUNTY ADULT CORRECTION CENTER BEGINNING IN FEBRUARY 2007 THROUGH HIS RELEASE IN THE FALL OF 2007.
14. AS THE RESULT OF THE UNLAWFUL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF WAS ILLEGALLY ATTACKED, ASSAULTED, BATTERED, ABUSED, DEGRADED, ILLEGALLY MISTREATED OTHERWISE WAS SUBJECTED TO ILLEGAL CONDUCT AND ACTIONS OF AND BY THE DEFENDANTS, CAUSED BY AND WAS AS A CONSEQUENCE OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM
15. AS A CONSEQUENCE OF THE AFORESAID ILLEGAL, FALSE, AND MALICIOUS CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, PLAINTIFF SUFFERED AND CONTINUES TO SEVERELY SUFFER FROM DAMAGES, INJURIES, LOSSES, AND OTHER ADVERSE EFFECTS AS WELL AS INCURRING ATTORNEYS FEES, COUNSEL FEES, COSTS, AND EXPENSES AND ALL OTHER DAMAGES AND INJURY PERMITTED AND ALLOWED BY LAW AS ARE APPLICABLE.

16. SAID ILLEGAL CONDUCT INCLUDED WITHOUT LIMITATION ONE VIOLATIONS OF CIVIL RIGHTS, VIOLATIONS OF THE FIRST, FOURTH, FIFTH, SIXTH, EIGHTH AND FOURTEENTH AMENDMENT OF THE CONSTITUTION OF THE UNITED STATES OF AMERICA, VIOLATIONS OF ARTICLE I SECTIONS 1, 2a, 5, 6, 7, 8, 10, 11, 12, OF THE CONSTITUTION OF THE STATE OF NEW JERSEY, AND SUCH OTHER MATTERS RELATED TO AN CAUSED BY THE UNLAWFUL ACTS OF THE DEFENDANTS.

17. AT ALL TIME RELEVANT THE DEFENDANTS CHICCHI, GRAFFAGNINO, SHAPIRO, DELANOY, BROWN, CHRISTENSEN, BAVOSA, BARTH, NAPRAVNIK, RODZIEWICZ, DE AMICUS, AND ONE OR MORE OF THE DOE AND SMITH DEFENDANTS, ACTED AS THE AGENTS, SERVANTS EMPLOYEES, REPRESENTATIVES, AND/OR IN ANY OTHER CAPACITY OF AND/OR ON BEHALF OF THE DEFENDANTS COUNTY OF MIDDLESEX AND THE MIDDLESEX COUNTY BOARD OF CHOSEN FREEHOLDERS

18. THE RESPECTIVE DEFENDANT GOVERNMENTAL ENTITIES ARE RESPONSIBLE FOR THE CONDUCT OF THEIR RESPECTIVE AGENTS, SERVANTS, EMPLOYEES, REPRESENTATIVES AND ALL OTHERS ACTING IN ANY OTHER CAPACITY FOR AND/OR ON THEIR/ITS BEHALF

19. THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM INCLUDES, WITHOUT LIMITATION, UNLAWFULLY ACTING UNDER THE COLOR OF LAW, AND OTHERWISE ACTING UNLAWFULLY.

FIRST COUNT.

37. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND FIRST, FOURTH, FIFTH, SIXTH, EIGHTH, AND FOURTEENTH AMENDMENTS THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

38. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY, DEPRIVATION OF HIS FREEDOM, DEPRIVATION OF HIS PURSUIT OF HAPPINESS, DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING

THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART, AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

39. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

SECOND COUNT.

40. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTIONS 1, 2a, 5, 6, 7, 8 10,11 AND 12 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

41. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES,

SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS THERETO OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS THERETO OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART, AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRD COUNT.

42. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS RESULTED IN THE PLAINTIFF BEING UNLAWFULLY DETAINED, IMPRISONED, AND INCARCERATED.

43. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS THERETO OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

44. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

FOURTH COUNT.

45. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS WAS WILLFUL AND/OR WANTON AND/OR RECKLESS AND/OR IN RECKLESS DISREGARD OF PLAINTIFF'S RIGHTS.

46. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE

CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

47. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

FIFTH COUNT.

48. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES GROSS NEGLIGENCE.

49. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF

HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

50. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

SIXTH COUNT.

51. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES,
NEGLIGENCE, CARELESSNESS OR OTHERWISE UNLAWFUL CONDUCT

52. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF
THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN
NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES,
SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF
HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF
HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL
OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE
DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER
DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS,
FEDERAL AND STATE, VIOLATION OF HIS RIGHTS AND PROTECTIONS UNDER THE
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VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE
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AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE
LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE
CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING
THERE TO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE
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OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER
WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

53. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

SEVENTH COUNT.

54. THE DEFENDANTS, ONE OR MORE OF THEM, VIOLATED THE FOURTH AMENDMENT OF THE CONSTITUTION OF THE UNITED STATES OF AMERICA.

55. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHTS AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY

AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

56. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TENTH COUNT.

57. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS.

58. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF

HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

59. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

ELEVENTH COUNT.

60. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS.

61. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF
THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN
NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES,
SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF
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OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE
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FEDERAL AND STATE, VIOLATION OF HIS RIGHTS AND PROTECTIONS UNDER THE
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AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE
LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE
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CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT
OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER
WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

62. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWELVTH COUNT.

63. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES AN INTERFERNECE WITH PLAINTIFF'S RIGHT OF DUE PROCESS OF LAW AS PROVIDED BY AND UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE UNITED STATES OF AMERICA.

64. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE

CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

65. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTEENTH COUNT.

66. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES AN INTERFERENCE WITH PLAINTIFF'S RIGHT OF DUE PROCESS OF LAW AS PROVIDED BY AND UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE STATE OF NEW JERSEY.

67. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHTS AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

68. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS'

FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER
WITH INTEREST.

FOURTEENTH COUNT.

69. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES A
DENIAL OF PLAINTIFF'S RIGHT OF DUE PROCESS OF LAW AS PROVIDED BY AND
UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE UNITED
STATES OF AMERICA.

70. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF
THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN
NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES,
SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF
HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF
HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL
OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE
DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER
DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS,
FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE
CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE
VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE
CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY
AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE
LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE
CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING

THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

71. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

FIFTEENTH COUNT.

72. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES A DENIAL OF PLAINTIFF'S RIGHT OF DUE PROCESS OF LAW AS PROVIDED BY AND UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE STATE OF NEW JERSEY.

73. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL

OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

74. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

SIXTEENTH COUNT.

75. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES LIBEL.

76. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHTS AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

77. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES,

REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

SEVENTEENTH COUNT.

78. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES FALSE LIGHT.

79. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHTS AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE

LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

80. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

EIGHTEENTH COUNT

81. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES INTERFERENCE WITH PLAINTIFF'S RIGHT TO EQUAL PROTECTION OF AND UNDER THE LAW PROVIDED BY AND UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE UNITED STATES OF AMERICA.

82. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES,

SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

83. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

NINETEENTH COUNT

84. THE ILLEGAL CONDUCT OF ONE OR MORE DEFENDANTS CONSTITUTES DENIAL OF PLAINTIFF'S RIGHT TO EQUAL PROTECTION UNDER AND OF THE LAW PROVIDED BY AND UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE UNITED STATES OF AMERICA.

85. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT

OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

86. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTIETH COUNT.

87. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES DENIAL OF PLAINTIFF'S RIGHT OF AND TO EQUAL PROTECTION UNDER AND OF THE LAW PROVIDED BY AND UNDER THE CONSTITUTION AND AMENDMENTS THERETO AND LAWS OF THE STATE OF NEW JERSEY.

88. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER

DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

96 WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY FIRST COUNT.

97. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES INTERFERENCE WITH PLAINTIFF'S RIGHT OF AND TO EQUAL PROTECTION UNDER

AND OF THE LAW PROVIDED BY AND UNDER THE CONSTITUTION AND
AMENDMENTS THERETO AND LAWS OF THE STATE OF NEW JERSEY.

98. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

99. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES,

COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY SECOND COUNT.

100. THE ILLEGAL CONDUCT OF ONE OR MORE OF THE DEFENDANTS CONSTITUTES INVASION OF PRIVACY.

101. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE

CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

102. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY THIRD COUNT.

103. THE DEFENDANTS CITY OF NEW BRUNSWICK AND NEW BRUNSWICK POLICE DEPARTMENT, NEGLIGENTLY, CARELESSLY AND OTHERWISE UNLAWFULLY HIRED, EMPLOYED, TRAINED, SUPERVISED, AND OTHERWISE FAILED TO EXERCISE ANY AND ALL OTHER RESPONSIBILITIES IN REGARD TO ITS DEFENDANT AGENTS, SERVANTS, EMPLOYEES, AND REPRESENTATIVES HEREIN RESULTING IN THE ILLEGAL

CONDUCT OF SAID DEFENDANT AGENTS, SERVANTS, EMPLOYEES, REPRESENTATIVES
AND ALL OTHERS ACTING ON ITS/THEIR BEHALF

104. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHTS AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

105. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES,

COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY FOURTH COUNT.

106. THE DEFENDANTS MIDDLESEX COUNTY, MIDDLESEX COUNTY PROSECUTOR'S OFFICE AND MIDDLESEX COUNTY PROSECUTOR NEGLIGENTLY, CARELESSLY AND OTHERWISE UNLAWFULLY HIRED, EMPLOYED, TRAINED, SUPERVISED, AND OTHERWISE FAILED TO EXERCISE ANY AND ALL OTHER RESPONSIBILITIES IN REGARD TO ITS DEFENDANT AGENTS, SERVANTS, EMPLOYEES, AND REPRESENTATIVES HEREIN RESULTING IN THE ILLEGAL CONDUCT OF SAID DEFENDANT AGENTS, SERVANTS, EMPLOYEES, REPRESENTATIVES AND ALL OTHERS ACTING ON ITS/THEIR BEHALF

107. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS,

FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

108. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY FIFTH COUNT.

109. THE DEFENDANTS, ONE OR MORE OF THEM, VIOLATED ARTICLE I SECTION 7 OF THE CONSTITUTION OF THE STATE OF NEW JERSEY.

110. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS

111. OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

112. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN

NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY SIXTH COUNT.

113. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND FIRST AMENDMENT THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

114. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE

CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

115. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY SEVENTH COUNT.

116. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND FOURTH AMENDMENT THERETO AS WELL

AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

117. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

118. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES,

COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY EIGHT COUNT.

119. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND FIFTH, AMENDMENT THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

120. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE

CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

121. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

TWENTY NINTH COUNT.

122. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND SIXTH AMENDMENT THERETO AS WELL

AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

123. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

124. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES,

COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

125. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND FIRST, FOURTH, FIFTH, SIXTH, EIGHT, AND FOURTEENTH AMENDMENTS THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

126. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE

127. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTIETH COUNT.

128. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND EIGHTH AMENDMENT THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

129. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

130. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES,

REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY FIRST COUNT.

131. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND EIGHTH AMENDMENT THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

132. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE

CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

133. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY FIRST COUNT.

134. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM, PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE UNITED STATES

OF AMERICA WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE UNITED STATES AND FOURTEENTH AMENDMENT THERETO AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE UNITED STATES OF AMERICA.

135. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

136. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY SECOND COUNT.

137. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTION S TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING ARTICLE I SECTION 1 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

138. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE

DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

139. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY THIRD COUNT.

140. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF

NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 2a AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

141. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

142. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY FOURTH COUNT.

143. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTION S TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 5 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

144. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE

DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

144. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY FIFTH COUNT.

145. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF

NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 6 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

146. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

147. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY SIXTH COUNT.

148. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTIONS 7 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

149. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE

DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

150. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY SEVENTH COUNT.

151. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF

NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTIONS 8 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

152. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

152. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY EIGHTH COUNT.

153. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 10 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

154. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE

DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

155. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

THIRTY NINTH COUNT.

156. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF

NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 10 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

157. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

158. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

FORTIETH COUNT.

159. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 11 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

160. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM,THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE

DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE *CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT* OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

161. WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

FORTY FIRST COUNT.

162. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS ONE OR MORE OF THEM,, THE PLAINTIFF'S CIVIL RIGHTS UNDER THE LAWS OF THE STATE OF

NEW JERSEY WERE VIOLATED AS WERE THE RIGHTS AND PROTECTIONS TO DUE PROCESS AS WERE ALL OTHER RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION OF THE STATE OF NEW JERSEY THERETO INCLUDING BUT NOT LIMITED TO ARTICLE I SECTION 12 AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS UNDER ALL OTHER LAWS OF THE STATE OF NEW JERSEY.

163. AS THE RESULT OF THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, THE PLAINTIFF, HAS SUFFERED DAMAGES ALL OF WHICH ARE PERMANENT IN NATURE, INCLUDING BUT NOT LIMITED TO PERSONAL INJURIES, DAMAGES, SUFFERING, PAIN, LOSS OF EDUCATION, EMPLOYMENT, INCOME, DEPRIVATION OF HIS LIBERTY; DEPRIVATION OF HIS FREEDOM; DEPRIVATION OF HIS PURSUIT OF HAPPINESS; DEPRIVATION OF HIS FAMILY, DEPRIVATION OF PROPERTY, AND ALL OTHER ADVERSE CONSEQUENCES DUE TO THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, AS WELL AS ANY AND ALL OTHER DAMAGES PROVIDED UNDER LAW DUE TO THE VIOLATION OF HIS CIVIL RIGHTS, FEDERAL AND STATE, VIOLATION OF HIS RIGHT AND PROTECTIONS UNDER THE CONSTITUTION AND AMENDMENTS OF THE UNITED STATES OF AMERICA, THE VIOLATION OF THE RIGHTS AND PROTECTIONS PROVIDED UNDER THE CONSTITUTION AND AMENDMENTS OF THE STATE OF NEW JERSEY AS WELL AS ANY AND ALL OTHER RIGHTS AND PROTECTIONS OTHERWISE PROVIDED UNDER THE LAWS OF THE UNITED STATES AND THE STATE OF NEW JERSEY AND ALL ADVERSE CONSEQUENCES AND INJURIES FLOWING THEREFROM AND/OR RELATING THERETO, WHICH SUCH DAMAGES, INJURIES AND ADVERSE CONSEQUENCES ARE CONTINUING AND ONGOING, IN WHOLE OR IN PART AS IS THE ILLEGAL CONDUCT OF THE DEFENDANTS, ONE OR MORE OF THEM, IN WHOLE OR IN PART, TOGETHER WITH ATTORNEYS FEES, INTEREST COSTS AND EXPENSES.

WHEREFORE PLAINTIFF DEMANDS JUDGEMENT FOR THE INJURIES, DAMAGES AND ADVERSE CONSEQUENCES AS SET FORTH AFORESAID, FOR DAMAGES, COMPENSATORY AND/OR PUNITIVE AND/OR EXEMPLARY AND/OR TREBLE IN NATURE TO THE EXTENT ALLOWED BY LAW, AS WELL AS ALL OTHER DAMAGES, REMEDIES AND RELIEF ALLOWED BY LAW, TOGETHER WITH COUNSEL/ATTORNEYS' FEES/CHARGES, COSTS, LEGAL EXPENSES, AND ALL OTHER EXPENSES, TOGETHER WITH INTEREST.

FIFTIETH COUNT

PLAINTIFF REQUEST HEREIN THAT THIS MATTER BE CERTIFIED AS A CLASS ACTION.

BY: GERALD GORDON, ATTORNEY FOR PLAINTIFF

GERALD GORDON, ATTORNEY FOR PLAINTIFF, MONDAY AUGUST 10, 2009

JURY DEMAND

TRIAL BY JURY OF TWELVE IS DEMANDED.

GERALD GORDON, ATTORNEY FOR PLAINTIFF MONDAY AUGUST 10, 2009